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February 2, 2022

**VIA ECF**

The Honorable Anne E. Thompson, U.S.D.J.  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: DePaco v. SIC Noticias, et al  
Civil Action No.: 3:21-cv-14402-AET-TJB

Dear Judge Thompson:

We represent Defendants SIC Noticias, Sociedade Independente de Comunicacao ("SIC"), Impresa Sociedade Gestora de Participacoes Sociais, SA ("Impresa"), Pedro Coelho ("Coelho"), Ricardo Costa ("Costa"), and Marta Reis ("Reis") in the this matter. We write to respectfully request an additional 10 day extension up until February 17, 2022 for our clients to answer, move or otherwise respond to the complaint. We are asking for this short extension in order to better accommodate counsel's schedule. Plaintiff's counsel has consented to this request. This is our second request for an extension.

If you have any questions, please contact us.

Respectfully submitted,

s/ Joseph N. Froehlich  
Joseph N. Froehlich

JNF:md

**So Ordered on February 4, 2022**  
**/s/ Anne E. Thompson, U.S.D.J.**